

**From:** Baird, Brian W <bwbaired@borgelt.com>  
**Subject:** RE: NOD - 4/15/24 Bergmann & VNCC  
**Date:** March 27, 2024 at 5:09 PM  
**To:** kmotley motleylegal.com kmotley@motleylegal.com, Nathaniel Cade nate@cade-law.com, Annalisa Pusick annalisa@cade-law.com, Meyer, Brianna J. BMeyer@CrivelloLaw.com, Hall Samuel C. SHall@CrivelloCarlson.com, Kosmeder, Stephanie N. SKosmeder@CrivelloLaw.com

Great, thanks Kim, I appreciate it.



**Brian W. Baird**  
Attorney  
**Direct:** 414-287-9184  
**Email:** [bwbaired@borgelt.com](mailto:bwbaired@borgelt.com)  
  
1243 N. 10<sup>th</sup> St., Suite 300  
Milwaukee, WI 53205  
  
[www.borgelt.com](http://www.borgelt.com)

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**From:** kmotley motleylegal.com <kmotley@motleylegal.com>  
**Sent:** Friday, March 22, 2024 4:39 PM  
**To:** Baird, Brian W <bwbaired@borgelt.com>; Nathaniel Cade <nate@cade-law.com>; Annalisa Pusick <annalisa@cade-law.com>; Meyer, Brianna J. <BMeyer@CrivelloLaw.com>; Hall Samuel C. <SHall@CrivelloCarlson.com>; Kosmeder, Stephanie N. <SKosmeder@CrivelloLaw.com>  
**Subject:** Re: NOD - 4/15/24 Bergmann & VNCC

Thanks Brian.

For VNCC's 30b6 remote depo is fine since she is out of state and still plan for April 15th.

We will schedule the depositions of Haynes, Galvan, and DicCello on April 25th.

Regards,  
Kim

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**From:** Baird, Brian W <[bwbaired@borgelt.com](mailto:bwbaired@borgelt.com)>  
**Sent:** Thursday, March 21, 2024 6:19 PM  
**To:** kmotley [motleylegal.com](mailto:kmotley@motleylegal.com) <[kmotley@motleylegal.com](mailto:kmotley@motleylegal.com)>; Nathaniel Cade <[nate@cade-law.com](mailto:nate@cade-law.com)>; Annalisa Pusick <[annalisa@cade-law.com](mailto:annalisa@cade-law.com)>; Meyer, Brianna J. <[BMeyer@CrivelloLaw.com](mailto:BMeyer@CrivelloLaw.com)>; Hall Samuel C. <[SHall@CrivelloCarlson.com](mailto:SHall@CrivelloCarlson.com)>; Kosmeder, Stephanie N. <[SKosmeder@CrivelloLaw.com](mailto:SKosmeder@CrivelloLaw.com)>  
**Subject:** RE: NOD - 4/15/24 Bergmann & VNCC

Great, thanks Kim. I am available April 25 and will block out the entire day for the depositions of Haynes, Galvan, and DicCello. I have confirmed that the corporate representative of VNCC, Linda Scott, is available for deposition on April 15 at 2 PM, as originally scheduled. However, since she is out of state on the East Coast, I would request that the deposition be conducted by videoconference, which I imagine we can arrange for in the conference room where the previous depositions will be conducted. Please let me know your thoughts on that, thanks.



**Brian W. Baird**



Attorney

**Direct:** 414-287-9184

**Email:** [bwbaired@borgelt.com](mailto:bwbaired@borgelt.com)

1243 N. 10<sup>th</sup> St., Suite 300

Milwaukee, WI 53205

[www.borgelt.com](http://www.borgelt.com)

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**From:** kmotley [motleylegal.com](http://motleylegal.com) <[kmotley@motleylegal.com](mailto:kmotley@motleylegal.com)>  
**Sent:** Thursday, March 21, 2024 12:48 PM  
**To:** Baird, Brian W <[bwbaired@borgelt.com](mailto:bwbaired@borgelt.com)>; Nathaniel Cade <[nate@cade-law.com](mailto:nate@cade-law.com)>; Annalisa Pusick <[annalisa@cade-law.com](mailto:annalisa@cade-law.com)>; Meyer, Brianna J. <[BMeyer@CrivelloLaw.com](mailto:BMeyer@CrivelloLaw.com)>; Hall Samuel C. <[SHall@CrivelloCarlson.com](mailto:SHall@CrivelloCarlson.com)>; Kosmeder, Stephanie N. <[SKosmeder@CrivelloLaw.com](mailto:SKosmeder@CrivelloLaw.com)>  
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Hello Brian et al,

We can do depositions on April 25 and May 3rd.

So, I propose moving Haynes, Galvan, and DicCello to April 25th. We can also figure out a date for the corporate depo of VNCC if the 15<sup>th</sup> does not work for you.

Please let me know. Thanks!

Kim

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**From:** Baird, Brian W <[bwbaired@borgelt.com](mailto:bwbaired@borgelt.com)>  
**Sent:** Monday, March 18, 2024 4:46 PM  
**To:** kmotley [motleylegal.com](http://motleylegal.com) <[kmotley@motleylegal.com](mailto:kmotley@motleylegal.com)>; Nathaniel Cade <[nate@cade-law.com](mailto:nate@cade-law.com)>; Annalisa Pusick <[annalisa@cade-law.com](mailto:annalisa@cade-law.com)>; Meyer, Brianna J. <[BMeyer@CrivelloLaw.com](mailto:BMeyer@CrivelloLaw.com)>; Hall Samuel C. <[SHall@CrivelloCarlson.com](mailto:SHall@CrivelloCarlson.com)>; Kosmeder, Stephanie N. <[SKosmeder@CrivelloLaw.com](mailto:SKosmeder@CrivelloLaw.com)>  
**Subject:** RE: NOD - 4/15/24 Bergmann & VNCC

Thanks Kim. I was unaware that you were interested in the 30b6 deposition of VNCC. I will need to check with my client to see if they are available on April 15.



**Brian W. Baird**

Attorney

**Direct:** 414-287-9184

**Email:** [bwbaird@borgelt.com](mailto:bwbaird@borgelt.com)

1243 N. 10<sup>th</sup> St., Suite 300

Milwaukee, WI 53205

[www.borgelt.com](http://www.borgelt.com)

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**From:** kmotley [motleylegal.com](http://motleylegal.com) <[kmotley@motleylegal.com](mailto:kmotley@motleylegal.com)>  
**Sent:** Wednesday, March 13, 2024 8:07 PM  
**To:** Baird, Brian W <[bwbaird@borgelt.com](mailto:bwbaird@borgelt.com)>; Nathaniel Cade <[nate@cade-law.com](mailto:nate@cade-law.com)>;  
Annalisa Pusick <[annalisa@cade-law.com](mailto:annalisa@cade-law.com)>; Meyer, Brianna J.  
<[BMeyer@CrivelloLaw.com](mailto:BMeyer@CrivelloLaw.com)>; Hall Samuel C. <[SHall@CrivelloCarlson.com](mailto:SHall@CrivelloCarlson.com)>; Kosmeder,  
Stephanie N. <[SKosmeder@CrivelloLaw.com](mailto:SKosmeder@CrivelloLaw.com)>  
**Subject:** NOD - 4/15/24 Bergmann & VNCC

Hello Brian,

Please find attached NOD for Ms. Bergmann and a 30b6 for the VNCC for April 15, 2024. If you have any concerns please let me know.

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Best,

Kim

Kimberley Cy Motley, Esq.

C.E.O. / Founding Partner

Motley Legal Services

Afghan Mobile : 93 (0) 788 887 887

Intl. Number : 1 (704) 765 - 4887

US Mobile : 1 (704) 763-5413

[motleylegal.com](http://motleylegal.com)

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